

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2001 )

Docket No. R2001-1

INTERROGATORIES OF MAGAZINE PUBLISHERS OF AMERICA, INC.  
TO UNITED STATES POSTAL SERVICE WITNESS PICKETT  
(MPA/USPS-T17-2-5)  
(November 13, 2001)

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, Magazine Publishers of America, Inc. (MPA) directs the following interrogatories to United States Postal Service witness Pickett (USPS-T-17).

Respectfully submitted,

  
James Pierce Myers

Counsel for  
MAGAZINE PUBLISHERS OF AMERICA, INC.

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**MPA/USPS-T17-2.** Please refer to your response to MPA/USPS-T17-1(c)(i) where you state, "If you are referring to the rate per linear foot that Amtrak charges the Postal Service [sic], I am told that this rate did not change from 1998 to 2000."

(a) Please confirm that the rate that Amtrak charges the Postal Service is a rate per linear foot. If not confirmed, in what unit is the rate that Amtrak charges the Postal Service stated?

(b) In the unit specified in your response to subpart (a), what was the per-unit rate that Amtrak charged the Postal Service in FY 1998?

(c) In the unit specified in your response to subpart (a), what was the per-unit rate that Amtrak charged the Postal Service in FY 1999?

(d) In the unit specified in your response to subpart (a), what was the per-unit rate that Amtrak charged the Postal Service in FY 2000?

(e) In the unit specified in your response to subpart (a), what does the Postal Service project the FY 2003 Amtrak per-unit rate to be?

(f) In the unit specified in your response to subpart (a), how many units of mail did Amtrak transport for the Postal Service in FY 1998?

(g) In the unit specified in your response to subpart (a), how many units of mail did Amtrak transport for the Postal Service in FY 1999?

(h) In the unit specified in your response to subpart (a), how many units of mail did Amtrak transport for the Postal Service in FY 2000?

(i) Please provide all contracts that the Postal Service has or had with Amtrak that cover FY 1998, FY 1999, and FY 2000.

**MPA/USPS-T17-3.** Please refer to your response to MPA/USPS-T17-1(c)(iv) where you state, "Furthermore, freight rail and inter-BMC [highway] transportation contracts contain inflation adjustment clauses to cover increases in fuel costs. From BY 1998 to BY 2000 diesel fuel costs increased by 66 percent."

(a) Please describe all factor input prices that are included in inflation adjustment clauses for freight rail and inter-BMC highway transportation contracts.

(b) What weight do the inflation adjustment clauses for freight rail and inter-BMC highway transportation contracts place on diesel fuel costs?

(c) By what percentage did inflation adjustment clauses for freight rail and inter-BMC highway transportation contracts increase the rates charged to the Postal Service between FY 1998 and FY 2000?

**MPA/USPS-T17-4.** Please confirm that Amtrak transports Postal Service trailers on flat cars (TOFCs). If confirmed, what percentage of Postal Service costs for Amtrak is for TOFCs?

**MPA/USPS-T17-5.** Please refer to your response to MPA/USPS-T17-1(c)(iv) where you state, "It is my understanding that the increased reliance on Amtrak reflected in these data is not the result of an explicit policy decision to move more Periodicals to Amtrak. The decision to use Amtrak is typically made on a case by case basis. In some instances, use of Amtrak is considered more economical. In others, Amtrak is thought to provide better service."

(a) State all statistics in support of your contention that Amtrak is more economical than freight rail and inter-BMC highway transportation.

(b) State all facts in support of your contention that Amtrak provides better service than freight rail and inter-BMC highway transportation.

(c) What was Amtrak's on-time performance (stated as a percentage) in FY 1997?

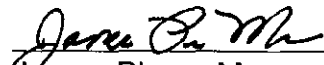
(d) What was Amtrak's on-time performance (stated as a percentage) in FY 1998?

(e) What was Amtrak's on-time performance (stated as a percentage) in FY 1999?

(f) What was Amtrak's on-time performance (stated as a percentage) in FY 2000?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

  
James Pierce Myers  
Counsel for  
MAGAZINE PUBLISHERS OF AMERICA, INC.

November 13, 2001  
Alexandria, VA